IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

)	
RUSSIAN RESEA	ARCH CENTER)	
THE KURCHATO	OV INSTITUTE,	
	Plaintiff,)	
)	Case No.: AMD 02-3878
v.)	
WESTERN SERV	/ICES CORP., et al.,	
	Defendants and)	
	Third-Party Plaintiff,)	
v.)	
GSE SYSTEMS, I	INC.	
	Third-Party)	
	Defendants.	

WESTERN'S NOTICE OF CORRECTION TO ITS MEMORANDUM IN OPPOSITION TO GSE'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS BY WSC IN RESPONSE TO GSE'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant and Third-Party Plaintiff, Western Services Corporation

("Western"), files this Notice to correct an inadvertent error made in its

Memorandum in Opposition to GSE's Motion to Compel Production of Documents

by WSC in Response to GSE's Second Request For Production of Documents

("Opposition"). GSE's Motion to Compel and Western's Opposition are not yet

before the Court as the parties are trying to resolve the disputes informally.

Nevertheless, as required by the Local Rules, Western's Opposition was docketed as

a Notice of Opposition¹ on October 20, 2003 (GSE's Motion to Compel was docketed as a Notice of Service of Motion to Compel on October 26, 2003).

1. The Opposition incorrectly states in Part I(B) that GSE's Motion to Compel was untimely because it was not filed within thirty days of receiving Western's responses, as required by Local Rule 104.8(a). In fact, Western's counsel had agreed to grant GSE an extension of time to file its Motion to Compel. The attorney that granted the extension, however, was not the same attorney who drafted the Opposition and the fact of the extension was not communicated to the drafting attorney. Western sincerely apologizes to the Court and to GSE's counsel for this inadvertent error.

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

/s/ By: Bruce R. Genderson (Bar No. 02427) George A. Borden (Bar No. 06268) Margaret A. Keeley (Bar No. 15654)

Ann Sagerson (Bar No. 15821)

725 Twelfth Street, N.W. Washington, D.C. 20005 (202) 434-5000

Counsel for Western Services Corporation and George Utmel

Dated: November 21, 2003

¹ Western's Opposition should have been docketed as a Notice of Service of Response to GSE's Motion to Compel.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Correction was served on the following electronically and by first-class mail on November 21, 2003:

> John M.G. Murphy, Esq. Ober, Kaler, Grimes & Shriver, P.C. 120 East Baltimore Street Baltimore, MD 21202

Charles L. Simmons, Jr., Esq. Gorman & Williams Two North Charles Street Suite 750 Baltimore, MD 21201

> ____/s/____ Ann N. Sagerson